

# EXHIBIT 3

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MARYLAND**

STATE OF MARYLAND; STATE OF  
DELAWARE; STATE OF CALIFORNIA; STATE  
OF COLORADO; STATE OF ARIZONA; STATE  
OF CONNECTICUT; DISTRICT OF COLUMBIA,  
STATE OF HAWAI'I; STATE OF ILLINOIS;  
OFFICE OF THE GOVERNOR *ex rel.* Andy  
Beshear, in his official capacity as Governor of the  
COMMONWEALTH OF KENTUCKY; STATE OF  
MAINE; COMMONWEALTH OF  
MASSACHUSETTS; PEOPLE OF THE STATE OF  
MICHIGAN; STATE OF MINNESOTA; STATE OF  
NEVADA; STATE OF NEW JERSEY; STATE OF  
NEW MEXICO; STATE OF NEW YORK; STATE  
OF NORTH CAROLINA; STATE OF OREGON;  
JOSH SHAPIRO, in his official capacity as  
Governor of the COMMONWEALTH OF  
PENNSYLVANIA; STATE OF RHODE ISLAND;  
STATE OF VERMONT; STATE OF  
WASHINGTON; STATE OF WISCONSIN;

Plaintiffs,

v.

CORPORATION FOR NATIONAL AND  
COMMUNITY SERVICE, operating as  
AmeriCorps; and JENNIFER BASTRESS  
TAHMASEBI, in her official capacity as Interim  
Head of the Corporation for National and  
Community Service;

Defendants.

Civ. No. 25-cv-01363 (DLB)

**DECLARATION OF DR. BARBARA FERRER**

Pursuant to 28 U.S.C. § 1746, I, Barbara Ferrer, hereby declare as follows:

1. I am the Director of the Los Angeles (“LA”) County Department of Public Health (“DPH”). DPH protects health, prevents disease, and promotes the well-being of all of LA County’s more than ten million residents. In this role, I oversee a budget of \$1.7 billion and direct a workforce of 5,500 public health practitioners. I have over 30 years professional experience as a philanthropic strategist, public health director, educational leader, and community advocate. Prior to joining DPH in 2017 as Director, I served as the Executive Director of the Boston Public Health Commission. The facts stated herein are of my own personal knowledge, and I could and would competently testify to them.

2. I submit this declaration in support of Plaintiffs’ motion for a preliminary injunction.

**Background on DPH**

3. With a population larger than Switzerland, LA County is the most populous county in the nation and is one of the country’s most diverse local public health jurisdictions. DPH is the leading public health authority in LA County and, in this role, works very closely with all communities to promote population health and disease prevention by marshaling a network of public health professionals, Community Based Organizations, health care providers and other partners. In addition, DPH provides critically-needed, directly operated services including immunizations and testing services as well as treatment for sexually transmitted diseases and tuberculosis through its network of thirteen community health clinics; provides both care management services and other support to children with special healthcare needs and their families; delivers neuro-rehabilitative care through its network of 23 school-based clinical-

rehabilitation clinics; provides substance abuse treatment and prevention programs; and connects children and families to needed programs and benefits provided by other agencies. DPH is also the lead County entity for chronic and communicable disease control, public health emergency preparedness and response, environmental health, and HIV/AIDS programs. DPH directly serves millions of County residents each year through its various programs and services.

4. DPH works very closely with all communities to promote population health and respond to public health emergencies.

5. DPH directly serves hundreds of thousands of County residents each year through its various programs and services. Los Angeles County is home to nearly 100 acute care hospitals 70 emergency departments, 200 dialysis units, and over 300 skilled nursing facilities.

6. These services are essential because having a large, highly mobile, and complex location and population makes Los Angeles County especially prone to diseases and outbreaks. It is a major hub for international travel and a port of entry with roughly 55 million travelers passing through LAX alone (United States's fifth busiest airport). With the large inflection of people from varying locations and its location, Los Angeles County is ground zero for the nation's challenges as they pertain to public health. Los Angeles County has been a prominent role model for its advanced healthcare infrastructure.

**DPH Relies on Funding and Members from AmeriCorps to Provide Disease Prevention and Other Essential Health Care Services in Los Angeles County**

7. To provide that infrastructure, DPH has relied on grant funding, including funding from the Corporation for National and Community Service ("AmeriCorps"). DPH received \$3,483,434 from AmeriCorps as Grant Number 22NDICA002, issued pursuant to the AmeriCorps State and National grant program as a national direct grant. This grant was awarded to deliver essential outreach, education, resource navigation, and disease prevention services throughout Los

Angeles County. The AmeriCorps funding is and has been, since 2022, a critical component of Los Angeles County funding to ensure all members of the Los Angeles community have access to health care services. This funding helps ensure the continued stability and development of the Los Angeles County public health infrastructure. AmeriCorps granted the first grant award in 2022 and several continuation applications since. The Grant 22NDICA002 was approved and was intended to run through August 31, 2025.

8. Los Angeles was particularly impacted by the COVID-19 pandemic. In early 2021, it was estimated that one in three residents in LA County had been infected with COVID-19. During a surge in January 2021, LA County reported over 15,000 new coronavirus cases a day. The AmeriCorps funding was used to deploy 80 AmeriCorps members that helped and continue to help Los Angeles County to respond to public health issues. AmeriCorps members support the Los Angeles community by providing vital community outreach, health education, resource sharing, and communicable diseases investigation across Los Angeles County.

9. Many diseases have had disproportionate impact on communities with fewer resources, leading to higher burden on morbidity and mortality. AmeriCorps members have been crucial towards ensuring all members of Los Angeles County receive necessary access to essential medical care. In particular, the AmeriCorps members were initially tasked with conducting grassroots in-person COVID-19 outreach, education, community presentations, and vaccine registrations that conventional public health campaigns have struggled to engage.

10. These outreach efforts continued past the immediate crisis posed by COVID-19 and AmeriCorps members provide a similar service for a range of diseases and local emergencies that are prevalent in LA County. Since 2022, 128 part-time AmeriCorps members have provided 90,739 service hours conducting 151 community presentations and 6,461 outreaches, reaching

more than 234,000 residents. They have scheduled over 300 vaccination appointments and provided more than 2,300 referrals to essential services ranging from health care, mental health, housing, and food assistance. This service is immeasurably important as infectious diseases can be transmitted to others and can easily lead to outbreaks across multiple settings, including schools, workplaces, and community programs. Preventing chronic disease supports worker productivity and reduces disruptions at worksites. The work of AmeriCorps was crucial at the height of the COVID-19 pandemic and continues to play a critical role in expanding the services of DPH to all parts of Los Angeles County.

#### **AmeriCorps's Funding of DPH has Protected the Health of Los Angeles Residents**

11. There are many examples that illustrate the importance of prevention and education efforts. In 2017, DPH was able to control a Hepatitis A outbreak among homeless and people experiencing substance use disorder through cooperation with community stakeholders and the effective provision of health services. If DPH had not been able to offer a full continuum of services, the cost of the epidemic could have easily swelled from \$2 million to more than \$14 million and resulted in dozens of deaths.

12. During the first half of 2019, DPH declared an outbreak of measles. There were eight confirmed cases of measles among Los Angeles County residents, and six non-resident measles cases that traveled through Los Angeles County. More than 100 staff members were and continue to be involved in responding to these individual cases and conducting contact investigations. Further, efforts to control the spread of measles among the general population necessitated the issuance of approximately 1,000 quarantine orders to exposed individuals. Vaccinations for diseases like measles are the most cost-effective and best line of defense. Costs for responding to and treating a case of measles can be as high as \$142,000 per case, far more than

the cost of vaccinations; indeed, a preliminary estimate of Los Angeles County DPH response costs revealed that it cost approximately \$27,000 per each measles case that transited through the Los Angeles International Airport on the way to other locations in the United States. For vaccines to be effective and protect the general population, public health providers like DPH provide adequate infrastructure and effective delivery of services.

13. These emergencies reflect the need for a well-staffed and well-funded department for public health. Since AmeriCorps have joined DPH, they have been able to provide ongoing outreach and education related to the measles given the recent multi-state outbreak that has spanned 30 jurisdictions, including Los Angeles.

14. AmeriCorps members are embedded in Regional Health Offices and thus support a wide variety of public health campaigns beyond Hepatitis, and COVID-19. They have been involved in mitigation efforts to increase awareness and reduce the transmission of measles (2025), flu, COVID-19, pertussis, and varicella (chicken pox) through vaccination outreach. Members have also supported mosquito-borne disease education and avian influenza (H5N1) outreach. Members provide community residents with education and outreach surrounding cardiovascular disease prevention presentations; opioid overdose awareness and Naloxone distribution; mental health workshops; environmental contamination and lead exposure; and work to address food insecurity through produce distributions. They further have assisted with community skill-building and emergency preparedness education including providing emergency planning presentations, leading hands-only CPR trainings, and supporting response and post-recovery efforts related to recent wildfires. These collective efforts contributed to reducing disease transmission and lower the overall public health burden.

**Impact of the AmeriCorps Funding Termination on DPH and LA County Residents**

15. On April 25, 2025, DPH received an official notification from AmeriCorps that DPH's grant was terminated effective immediately. The notice bases termination of the award purely based on a change in agency priorities. At the time DPH was notified of the funding termination, AmeriCorps had not found DPH noncompliant with the terms of the AmeriCorps award.

16. As a result of this termination, the Los Angeles County Department of Public Health lost \$1,099,953 that the county relied on until the end of the budgetary period in August 2025, not including a potential continuation of the funds further, into August 2026, under a typically granted no-cost extension. Of that \$1,099,953, \$1,030,340 was used for living allowances for the AmeriCorps members including mileage and parking, \$35,000 was set aside for outreach materials and supplies, and \$34,613 was set aside for temporary personal contracts. A Year 3 award was approved and granted, allowing recruitment for Year 3 members through June 2025, with a 12-month service period following, through July 2026. This time frame for recruitment required an understanding by AmeriCorps that a no-cost extension would be required to allow for the full completion of service by AmeriCorps members.

17. On April 9, 2025, DPH was notified that AmeriCorps would not award a no-cost extension despite no-cost extensions being typically granted. This extension would have extended the termination date of the AmeriCorps grant from August 31, 2025 to August 31, 2026. The agency stated that it was no longer awarding any no-cost extensions to Public Health AmeriCorps grantees because the Acting Director of AmeriCorps State and National wanted to "ensure agency compliance with administration priorities." This agency action left 26 AmeriCorps members unable to complete their 12-month service terms with LA County DPH.



18. DPH has been unable to obtain alternative sources of funding to offset the loss of this grant money. Without AmeriCorps' ongoing support for member living allowances, DPH cannot keep any of the existing AmeriCorps members in service. The remaining 35 members will have to be let go and one AmeriCorps temporary personnel contract service request is in jeopardy.

19. Based on my experience overseeing DPH and knowledge of the communities that it serves, I anticipate that the dismantling of AmeriCorps will have grave impacts on (i) the health of many of the residents of Los Angeles County; and on (ii) the public health infrastructure of the Los Angeles County. All aspects of the Los Angeles County public health system will be impacted as a result of this funding termination and the loss of AmeriCorps staff tasked with grant administration: Los Angeles County will have to immediately terminate services with 35 AmeriCorps members as Los Angeles County attempts to maintain our vast network on a diminished budget.

*a. Irreparable Harm to Public Health*

20. The result of such cuts will directly undermine DPH's ability to promote the well-being of all people in LA County. Public health strategies, like those employed by AmeriCorps members, can only succeed because they reach individuals where they are with important information and services. When public health providers are unable to offer services directly in communities with less access to resources, the impact is felt across the county. Infectious diseases are more likely to spread at community gatherings, events, workplaces, and schools. This leads to the negative health impacts for our communities, including higher rates of communicable diseases; increased use of emergency rooms as a method of primary health care; and increased rates of morbidity and mortality. Vulnerability to disease in any part of our community risks spreading to other portions of the county. Loss of AmeriCorps' volunteers' service with vulnerable and hard to

reach portions of Los Angeles thus will impact the entire county. Eliminating these funds will exacerbate health outcomes in Los Angeles County, harm its ability to respond effectively to community needs and reduce the burden of preventable diseases; this creates an increased burden and cost on DPH and Los Angeles County.

21. The dismantling of AmeriCorps will result in decreased access to accurate and timely health information and education among communities most impacted by negative health impacts related to communicable and infectious diseases. AmeriCorps members provide important health information and education to prevent and mitigate the spread of communicable and infectious diseases, which will pose a serious health and safety risk to Los Angeles County residents and persons visiting our jurisdiction. It will also impose significant costs on Los Angeles County taxpayers, through diminished pathways for future public health professionals to prepare and be ready to support critical public health response, jeopardizing the health and wellbeing of county residents.

22. DPH's successful efforts to remediate the outbreaks of communicable diseases like Measles, the Flu, COVID discussed above were vitally dependent on the funding provided by AmeriCorps and would not have been as successful without it – leading to greater instances of disease and death among Los Angeles County residents. DPH is now facing considerable challenges in addressing the rising rates of ever-present diseases, such as tuberculosis ("TB"), as well as new and reemerging outbreaks, such as measles, pertussis, typhus, and West Nile Virus. There were 542 TB cases in Los Angeles County in 2024, a .6% increase from 2023. While Los Angeles has been able to manage all of these outbreaks in the past, our ability to manage similar outbreaks will be significantly diminished given the Defendant's conduct.

23. In sum, I believe that the termination of funding and the substantial reduction in AmeriCorps' staff and volunteers will lead to lasting, severe health impacts for Los Angeles County residents. Los Angeles County as a whole will suffer as a result of this decrease in funding. DPH's ability to safeguard the health and well-being of our communities will be diminished and the impact of this will have consequences on other cities and neighboring states, especially to the extent that this funding termination cripples Los Angeles County's ability to prevent the spread of infectious diseases.

*a. Irreparable Harm to the Department of Public Health*

24. In addition to all the harm that will occur to the residents of Los Angeles County that use and depend on the health services provided by the Department of Public Health, Los Angeles County employees and contractors will also experience immediate and irreparable harm as a result of the termination of AmeriCorps funding and drastic reduction in AmeriCorps staff. As discussed above, the public health infrastructure in Los Angeles County is vast—and as a result—expensive. Budget cuts, layoffs, elimination of funding for community partners, and permanent closure of certain units will be necessary to respond to the termination. AmeriCorps members, upon completion of their services hours, are to receive the Segal AmeriCorps Education Award, which can be used to pay for qualified school costs, like tuition, or to repay qualified student loans. Early termination of the AmeriCorps funding not only impacts the monthly stipends that AmeriCorps are due for their service, but also prevents them from qualifying for the Education Award at the completion of the program, further harming them.

25. All Californians deserve to live in health and thriving communities, which is the role of public health. The Los Angeles Department of Public Health remains committed to seeking the resources required to support the critical, lifesaving infrastructure needed to keep people

healthy and protect them against infectious disease, vaccine-preventable diseases, and health emergencies.

I declare under penalty of perjury under the laws of the United States that, to the best of my knowledge, the foregoing is true and correct.

Executed on May 3, 2025, in Los Angeles, California.

A handwritten signature in blue ink, appearing to read "Barbara Ferrer", is written over a horizontal line.

Dr. Barbara Ferrer  
Director  
Los Angeles County Department of Public Health